REMARKS/ARGUMENTS

1.   **Summary of the Office Action**

Claims 1-6 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Bhattacharjee et al, "Application-layer Anycasting", INFOCOM '97, pp. 1388-1396, Apr. 1997 (hereinafter "Bhattacharjee").

Claims 7, 8, 10, 11 and 13-15 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,415,323 (hereinafter "McCanne").

Claims 9 and 12-15 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over McCanne in view of an Official Notice.

2.   **Response to 35 U.S.C.§ 102(b) Rejections**

Reconsideration of this application, as amended, is respectfully requested. The claims have been amended as recited above and all of the amendments are supported by the specification as originally filed. No new matter has been added. The claims of this application are patentable over the cited reference for at least the reasons discussed below.

To anticipate a claim, the reference must teach every element of the claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Bhattacharjee presents an anycasting paradigm at the application layer that provides a service that maps anycast domain names into one or more IP addresses using anycast resolvers. In particular, Bhattacharjee illustrates an anycast resolver architecture in Figure 2, wherein "each network location is preconfigured with the address of its local anycast resolver in the same way

local DNS servers are configured. An anycast client makes its initial anycast query to its local resolver. If the resolver is authoritative for the ADN in the query or if it has cached information about the ADN, it can process the query immediately and return the appropriate response. Otherwise, the local resolver determines the address of the authoritative resolver for the Domain Name part of the ADN and obtains the anycast group's information which is then cached in the local resolver. Determining the address of the authoritative anycast resolver for a particular domain can be done using the same technique used for DNS to determine an authoritative name server" (Page 4, Col.1, Paragraph 3).

However, Bhattacharjee fails to teach or suggest each and every element of the present claims. The present claims include "receiving a request at an information object repository for an information object at an anycast network address and **instructing the information object repository to obtain a copy of the information object at the corresponding unicast address**; resolving the request to a corresponding unicast address for the information object; and instructing the information object repository to obtain a copy of the information object at the corresponding unicast address. " (Claim 1; emphasis added).

Bhattacharjee is significantly different from the present claims as Bhattacharjee does not require the information object repository to obtain a copy of the information object at the corresponding unicast address. Instead, Bhattacharjee only teaches using a local anycast resolver to fetch the anycast group's information from the servers related to the Anycast Domain Name. The Office Action asserts on page 3, section 6 that these ADN related servers are equivalent in functionality to an information object but this assertion is incorrect. In particular, the present claims clearly define the information object as an object located at the corresponding unicast address. In contrast, Bhattacharjee teaches that ADN related servers contain IP address of the information object (Page 4, Col.1, Paragraph 3). Therefore, the ADN related servers are not information object of the unicast address.

Bhattacharjee fails to teach or even suggest each and every element of the present claims. Therefore, claims 1-6 are patentable over Bhattacharjee.

Claims 7, 8, 10, 11 and 13-15 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by McCanne. McCanne describes a proximity-based redirection system for service-to-client attachment in a virtual overlay distributed system. McCanne does not deviate from the teachings of Bhattacharjee where a redirector is used to redirect the client with an anycast query to a unicast service node. Similarly, the redirector as taught by McCanne does not "obtain a copy of the information object at the corresponding unicast address" as recited in the present claims. Therefore, McCanne fails to teach each and every element of the present claims and consequently, the present claims are patentable over McCanne.

3. Response to 35 U.S.C.§ 103(a) Rejections

Claims 9 and 12-15 have been rejected under 35 U.S.C. § 103(a) as being obvious in view of McCanne. As established above, McCanne fails to anticipate the present claims as it does not teach that the information object repository is configured to obtain a copy of the information object at the corresponding unicast address. Based on this alone, claims 9 and 12-15 are not anticipated by McCanne.

Furthermore, as asserted by the Office Action, McCanne fails to disclose the present claims 9 and 12 where a failure message is sent to the source of the request for the information object. Indeed, McCanne teaches that when "the ARN "times out" the SN database entries, SN's that fail are not used for service requests. Thus, if a client reconnects to the service (either transparently to the user or with user interaction), **the service is restarted on another service node**." (McCanne, Col.13, lines 34-38). Therefore, McCanne is able to redirect the client to another service node when an existing one failed and consequently, there is no need for McCanne to send a failure message to the client.

4. Conclusion

Having tendered the above remarks and amended the claims as indicated herein, the Applicants respectfully submit that all rejections have been addressed and that the claims are now in a condition for allowance, which is earnestly solicited.

If there are any additional charges, please charge Deposit Account No. 02-2666. If a telephone interview would in any way expedite the prosecution of the present application, the Examiner is invited to contact Jaina Chua at (408) 947-8200 ext. 213.

Respectfully Submitted,

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Dated: __November 12, 2004__

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